

Exhibit 2

1 PAUL CARLUCCI
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 -----X
5 AUSTIN FENNER and IKIMULISA LIVINGSTON,

6 Plaintiffs,
7 -against-

09 CIV 9832 (BSJ) (RLE)

8 NEWS CORPORATION, NYP HOLDINGS, INC., d/b/a
9 THE NEW YORK POST and DAN GREENFIELD and
10 MICHELLE GOTTHELF,

11 Defendants.

12 -----X
13 SANDRA GUZMAN,

14 Plaintiff,

15 vs. 09 CIV 9323 (BSJ) (RLE)

16 NEWS CORPORATION, NYP HOLDINGS, INC., d/b/a
17 THE NEW YORK POST, and COL ALLAN, in his
18 official and individual capacities,

19 Defendants.

20 -----X
21 VIDEOTAPED DEPOSITION OF PAUL CARLUCCI
22 New York, New York
23 Friday, June 22, 2012

24 REPORTED BY: BARBARA R. ZELTMAN
25 (BOBBIE)

Professional Stenographic Reporter

Job Number: 50903

Page 2

PAUL CARLUCCI

June 22, 2012
10:11 a.m.

Videotaped deposition of PAUL CARLUCCI
taken by Defendants, pursuant to Notice, at the
offices of THOMPSON WIGDOR, LLP, 85 Fifth Avenue,
New York, New York, before BARBARA R. ZELTMAN, a
Professional Stenographic Reporter and Notary Public
within and for the State of New York.

Page 3

PAUL CARLUCCI

APPEARANCES:

THOMPSON WIGDOR, LLP
Attorneys for the Plaintiffs
85 Fifth Avenue
New York, New York 10003
BY: KENNETH THOMPSON, ESQ.
PAUL CLARK, ESQ.

KASOWITZ, BENSON, TORRES & FRIEDMAN, LLP
Attorneys for the Defendants
1633 Broadway
New York, New York 10019
BY: MARK LERNER, ESQ.
MARC KASOWITZ, ESQ.
BLYTHE LOVINGER, ESQ.

ALSO PRESENT: Jordan Lippner, News America
Incorporated

Manuel Garcia, Videographer

Page 4

PAUL CARLUCCI

IT IS HEREBY STIPULATED AND AGREED
by and between the attorneys for the respective
parties herein that filing and sealing be and
the same are hereby waived.

IT IS FURTHER STIPULATED AND AGREED
that all objections, except as to the form of
the question, shall be reserved to the time
of trial.

IT IS FURTHER STIPULATED AND AGREED
that the within deposition may be signed and
sworn to before any officer authorized to
administer an oath with the same force and
effect as if signed and sworn to before
the Court.

Page 5

PAUL CARLUCCI

THE VIDEOGRAPHER: This is the
start of tape labeled Number 1 of the
videotaped deposition of Paul
Carlucci In the Matter of: Austin
Fenner and Ikimulisa Livingston
versus News Corporation, NYP
Holdings. And Sandra Guzman versus
NewsCorp, on June 22, 2012 at
approximately 10:11 a.m.

My name is Manuel Garcia from TSG
Reporting, Inc. and I'm the legal video
specialist. The court reporter is Bobbie
Zeltman in association with TSG
Reporting.

Will counsel please introduce
yourselves.

MR. THOMPSON: My name is Ken
Thompson of Thompson Wigdor. I'm
here with my colleague Paul Clark.
We represent the plaintiffs Sandra
Guzman, Austin Fenner and Ikimulisa
Livingston.

MR. KASOWITZ: Mark Kasowitz.

MR. LERNER: Mark Lerner.

Page 6

1 PAUL CARLUCCI
2 Jordan Lippner and Blythe Lovinger
3 for the defendants.

4 PAUL CARLUCCI,
5 having been first duly sworn by
6 Barbara R. Zeltman, Notary Public,
7 was examined and testified as follows:

8 EXAMINATION BY MR. THOMPSON:

9 Q Mr. Carlucci, is there any reason
10 why you can't testify truthfully today?

11 A No, there isn't.

12 Q Any reason why you can't testify
13 fully today?

14 A No, there isn't.

15 Q Have you ever had your deposition
16 taken before?

17 A Yes, I have.

18 Q How many times have you had your
19 deposition taken before today?

20 A Approximately three or four times.

21 Q When was the first time you had
22 your deposition taken?

23 A Probably six or seven years ago I
24 had a deposition taken.

25 Q Were you working at The New York

Page 7

1 PAUL CARLUCCI

2 Post at the time?

3 A I don't think so.

4 Q Where were you employed at the
5 time?

6 A I was employed at News America
7 Marketing.

8 Q And do you recall what type of case
9 you had your deposition taken in that first
10 time?

11 A The first time, I don't recall the
12 detail of what the case was about.

13 Q Do you recall anything about the
14 case in which you had to give a deposition
15 that first time?

16 A No, I don't.

17 Q Was it an employee who brought the
18 lawsuit?

19 A No.

20 Q Were you sued as part of that case
21 where you gave a deposition?

22 MR. KASOWITZ: Mr. Carlucci
23 personally?

24 MR. THOMPSON: Yes.

25 MR. KASOWITZ: You can answer.

Page 8

1 PAUL CARLUCCI

2 A Would you repeat the question?

3 Q Were you sued in that case in
4 an individual capacity?

5 A No.

6 Q Was NewsCorp sued as part of that
7 case?

8 A I don't think so.

9 Q When was the second time you had
10 your deposition taken?

11 A Approximately five years ago.

12 Q And do you recall what type of case
13 you had your deposition taken in, the second
14 time you testified?

15 A I recall it was a competitor's case
16 brought against News America Marketing.

17 Q Were you sued individually in that
18 case?

19 A No, I was not.

20 Q And when was the third time you had
21 your deposition taken before today?

22 A Probably about three years ago.

23 Q Do you recall the case -- strike
24 that.

25 Do you recall the type of case it

Page 9

1 PAUL CARLUCCI

2 was when you were deposed the third time?

3 A Yes, I do.

4 Q What type of case was it, sir?

5 A It was a case brought by a
6 competitor on the grounds of predatory
7 pricing and unfair business practices.

8 Q And who was that competitor who
9 brought that lawsuit?

10 A That was Valassis.

11 Q And were you sued in your
12 individual capacity?

13 A No, I was not.

14 Q Was News Corporation sued in that
15 lawsuit?

16 A I do not know if they were.

17 Q Do you recall giving any deposition
18 testimony on any other occasion besides the
19 three you just testified about?

20 A I believe I might have given one
21 12/14 years ago.

22 Q Do you recall the case that
23 happened 12 or 14 years ago?

24 A No, I do not.

25 Q Do you recall giving a deposition

Page 10

1 PAUL CARLUCCI
 2 in the case in the years ago?
 3 A Vaguely.
 4 Q What do you vaguely recall about
 5 that particular case?
 6 A It was very short and it was
 7 dismissed.
 8 Q What type of case was it?
 9 A A competitor's case.
 10 Q Were you working at News America at
 11 the time?
 12 A Yes, I was.
 13 Q Do you recall giving deposition
 14 testimony on any other occasion besides what
 15 you just testified to?
 16 A No, but I certainly could have.
 17 Q Well, since you've had your
 18 deposition taken on other occasions, I want
 19 to make sure the rules that govern this
 20 particular deposition are clear.
 21 If I ask you a question and you
 22 don't hear me, just let me know and I'll
 23 repeat it. As you can tell, we have a busy
 24 Fifth Avenue outside with a lot of noise.
 25 If I ask you a question that you

Page 12

1 PAUL CARLUCCI
 2 follow is everything that we say to each
 3 other today has to be said verbally, because
 4 as you can see there is a court reporter
 5 sitting next to you and she's preparing a
 6 transcript of this deposition.
 7 Do you understand?
 8 A Yes, I do.
 9 Q Do you have any questions based on
 10 anything I've said?
 11 A No, I do not.
 12 Q No?
 13 A No.
 14 Q Do you have a position with The New
 15 York Post today?
 16 A Yes.
 17 Q What is your position?
 18 A Publisher.
 19 Q How long have you been Publisher of
 20 The New York Post?
 21 A Approximately seven years.
 22 Q And do you know who appointed you
 23 as Publisher of The New York Post?
 24 A Yes.
 25 MR. KASOWITZ: Object to form.

Page 11

1 PAUL CARLUCCI
 2 don't understand, let me know and I'll
 3 rephrase it.
 4 Do you understand that?
 5 A Yes.
 6 Q If you need to take a break to talk
 7 to your lawyers, go to the restroom or for
 8 any reason, just let me know.
 9 Okay?
 10 A Yes.
 11 Q What I would ask that you do, if
 12 I'm in the middle of asking a question, that
 13 you answer the question first and then we'll
 14 take a break.
 15 Okay?
 16 A I didn't hear that, believe it or
 17 not, from the noise outside.
 18 Q I'll repeat that.
 19 If I'm in the middle of asking you
 20 a question, I ask that you answer the
 21 question and then we can take a break.
 22 Okay?
 23 Do you understand that?
 24 A Yes.
 25 Q The other rule that you have to

Page 13

1 PAUL CARLUCCI
 2 You can answer.
 3 A Yes.
 4 Q Who appointed you Publisher of
 5 The New York Post?
 6 A Rupert Murdoch.
 7 Q How do you know that Rupert Murdoch
 8 made the decision to make you Publisher of
 9 The New York Post?
 10 A Could you repeat the question.
 11 Q How do you know that it was Rupert
 12 Murdoch who made the decision to make you
 13 Publisher of The New York Post?
 14 A I don't know if it was Rupert
 15 Murdoch who made the decision.
 16 Q Who conveyed to you the decision to
 17 make you Publisher of The New York Post?
 18 A Rupert Murdoch.
 19 Q Do you recall what Mr. Murdoch said
 20 to you when he advised you that you would
 21 become the Publisher of The New York Post?
 22 A No, I don't.
 23 Q Do you know who was actually the
 24 Publisher of The New York Post before you
 25 assumed that position?

Page 14

1 PAUL CARLUCCI
 2 A No, I don't know who the publisher
 3 was.
 4 Q Do you know if Rupert Murdoch ever
 5 served as Publisher of The New York Post
 6 before you?
 7 A I do not know that.
 8 Q Isn't it true, Mr. Carlucci, that
 9 you replaced Rupert Murdoch as Publisher of
 10 The New York Post?
 11 MR. KASOWITZ: Object to form.
 12 It's asked and answered. I think he
 13 just answered those questions.
 14 I'll let him answer again.
 15 A I don't know who I replaced as
 16 Publisher of The New York Post.
 17 Q Okay.
 18 Do you know the identities of any
 19 individual who served as Publisher of
 20 The New York Post before you took over that
 21 position?
 22 A Yes.
 23 Q Can you identify anyone else who
 24 you know that has served as Publisher of
 25 The New York Post before you took that

Page 16

1 PAUL CARLUCCI
 2 years he was.
 3 MR. KASOWITZ: Don't guess.
 4 Don't guess.
 5 Q Is it your position that Lachlan
 6 Murdoch served in that position for at least
 7 a year?
 8 MR. KASOWITZ: Object to form.
 9 You can answer if you know.
 10 A Yes.
 11 Q And is it your position that he
 12 served in that position at least for several
 13 years?
 14 MR. KASOWITZ: Object to form.
 15 A Yes.
 16 Q And when did Martin Singermer [sic]
 17 serve as Publisher of The New York Post?
 18 MR. KASOWITZ: It's Singerman.
 19 MR. THOMPSON: Singerman.
 20 A I don't know the exact years.
 21 Q How long did he serve in that
 22 position?
 23 A I couldn't give an exact number of
 24 years.
 25 Q Did he serve in the position of

Page 15

1 PAUL CARLUCCI
 2 position?
 3 A Yes, I can.
 4 Q Please identify those individuals.
 5 A Lachlan Murdoch, Martin Singerman.
 6 Q I'm sorry. I didn't hear you.
 7 A Martin Singerman.
 8 Q Anyone else?
 9 A Not that I can recall.
 10 Q Who is Lachlan Murdoch?
 11 A I'm sorry, once more.
 12 Q Who is Lachlan Murdoch?
 13 MR. KASOWITZ: "Lachlan"
 14 Murdoch.
 15 A Lachlan Murdoch was the Publisher
 16 of The New York Post for several years.
 17 Q Is he related to Rupert Murdoch?
 18 A Yes, he is.
 19 Q How is he related to Rupert
 20 Murdoch?
 21 A He is Rupert Murdoch's son.
 22 Q How long did Lachlan Murdoch serve
 23 as Publisher of The New York Post, if you
 24 know?
 25 A I wouldn't be sure of how many

Page 17

1 PAUL CARLUCCI
 2 Publisher of The New York Post before or
 3 after Lachlan Murdoch held that position?
 4 A Before.
 5 Q Now, what are your primary duties
 6 as Publisher of The New York Post?
 7 A I am charged with all the business
 8 aspects of The New York Post.
 9 Q What do you mean you are in charge
 10 of all the business aspects of The New York
 11 Post?
 12 A The non --
 13 MR. KASOWITZ: Object to form.
 14 You can answer.
 15 A Noneditorial.
 16 Q Do you have any direct reports in
 17 your position as Publisher of The New York
 18 Post?
 19 A Yes.
 20 Q How many people directly report to
 21 you as Publisher of The New York Post?
 22 A Four or five.
 23 Q Please identify those individuals
 24 who directly report to you.
 25 A Chief Financial Officer.

Page 18

1 PAUL CARLUCCI
 2 Q Who is that?
 3 A Michael Racano.
 4 Q Racano?
 5 A Racano.
 6 Q Who else?
 7 A Senior Vice President, Howard
 8 Adler.
 9 Head of Human Resources, Amy
 10 Scaldone.
 11 Q Anyone else?
 12 A Not off the top of my head that
 13 reports directly to me.
 14 Q Do you have any role in the hiring
 15 of editors who work for The New York Post?
 16 A No, I do not.
 17 Q Have you ever played a role in the
 18 hiring of the editors at The New York Post?
 19 A No, I have not.
 20 Q Mr. Carlucci, do you know who has
 21 the authority to hire editors who work for
 22 The New York Post?
 23 MR. KASOWITZ: I'm going to
 24 object to the form.
 25 You can answer.

Page 20

1 PAUL CARLUCCI
 2 The New York Post, correct?
 3 MR. KASOWITZ: Objection.
 4 Asked and answered.
 5 A Correct.
 6 Q And you've been the Publisher of
 7 The New York Post for seven years, correct?
 8 A Correct.
 9 Q In your seven years as serving as
 10 Publisher of The New York Post, did you ever
 11 inquire regarding who had authority for
 12 terminating editors at The New York Post?
 13 MR. KASOWITZ: Objection.
 14 Asked and answered.
 15 You can answer.
 16 A No.
 17 Q Who is the highest ranking official
 18 on the Editorial side of The New York Post?
 19 A That would be the Editor in Chief.
 20 Q Who is that?
 21 A That would be Col Allan.
 22 Q Does Col Allan report to you?
 23 A No, he does not.
 24 Q Has he ever reported to you?
 25 A Not that I am aware of.

Page 19

1 PAUL CARLUCCI
 2 A No, I do not.
 3 Q So as you sit here today, you have
 4 no idea who is responsible for hiring the
 5 editors of the paper you are publisher of?
 6 MR. KASOWITZ: Object to form.
 7 Asked and answered.
 8 A No, I do not.
 9 Q Have you ever inquired in terms of
 10 who has the authority to hire editors at
 11 The New York Post?
 12 A Not that I can recall.
 13 Q Well, do you have any authority to
 14 terminate an editor at The New York Post?
 15 A No, I do not.
 16 Q Have you ever terminated any editor
 17 at The New York Post since you've served as
 18 publisher of that newspaper?
 19 A No, I have not.
 20 Q Do you know who has the authority
 21 to terminate editors at The New York Post?
 22 MR. KASOWITZ: Object to form.
 23 You can answer.
 24 A No, I do not.
 25 Q Well, you are the Publisher of

Page 21

1 PAUL CARLUCCI
 2 Q Have you ever discussed with Col
 3 Allan the decision to terminate any editor
 4 at The New York Post?
 5 A Not that I recall.
 6 Q Have you ever told Col Allan that
 7 he should terminate any editor at The New
 8 York Post?
 9 A No.
 10 Q Has Col Allan ever discussed with
 11 you the possibility of terminating any
 12 editor at The New York Post?
 13 MR. KASOWITZ: You can answer.
 14 A Not that I recall.
 15 Q As publisher of The New York Post,
 16 Mr. Carlucci, who makes the decisions
 17 regarding whether a particular employee
 18 should receive a certain amount in annual
 19 salary, you or someone else?
 20 MR. KASOWITZ: I'm going to
 21 object to the question.
 22 It's just unclear to me. You said
 23 as publisher --
 24 MR. THOMPSON: I'll rephrase
 25 it.

Page 22

1 PAUL CARLUCCI
 2 MR. KASOWITZ: Thank you.
 3 Q As publisher of The New York Post,
 4 do you set the salaries of the employees at
 5 the newspaper?
 6 MR. KASOWITZ: Does he set the
 7 salaries?
 8 MR. THOMPSON: Yes.
 9 MR. KASOWITZ: Okay. I just
 10 didn't hear it. I heard some noise
 11 outside.
 12 A No, I do not.
 13 Q Do you know who determines the
 14 salaries that are paid to New York Post
 15 employees?
 16 A Could you say the question one more
 17 time. I'm sorry.
 18 Q Do you know who determines what
 19 salaries New York Post employees are to be
 20 paid?
 21 A Not technically, no.
 22 Q What do you mean by "not
 23 technically"?
 24 A Most of the salaries would be
 25 grandfathered to where they were long before

Page 24

1 PAUL CARLUCCI
 2 But I'll object to the form.
 3 That's fine.
 4 BY MR. THOMPSON:
 5 Q Mr. Carlucci, do you have the
 6 authority to discipline an editor at The New
 7 York Post?
 8 MR. KASOWITZ: Object to form.
 9 You can answer.
 10 A I do not think so, no.
 11 Q Do you have authority to discipline
 12 any employee who works on the Editorial side
 13 of The New York Post?
 14 MR. KASOWITZ: Object to form.
 15 You can answer.
 16 A Could you repeat that one more
 17 time. I'm sorry.
 18 Q Sure.
 19 MR. THOMPSON: Bobbie, can you
 20 repeat that.
 21 THE REPORTER: Sure.
 22 (Requested portion of record read:
 23 "Q. Do you have authority to
 24 discipline any employee who works on the
 25 Editorial side of The New York Post?")

Page 23

1 PAUL CARLUCCI
 2 the current management team was in place.
 3 Q Well, let me ask it differently.
 4 If a new editor is hired at The New
 5 York Post, who determines that person's
 6 salary?
 7 A I'm not exactly sure.
 8 Q Well, did you ever have a role in
 9 determining the salary of an editor at
 10 The New York Post?
 11 A No, I did not.
 12 Q Did you ever interview a candidate
 13 who was applying for a position as an editor
 14 at The New York Post?
 15 A No.
 16 Q Do you know, Mr. Carlucci, who
 17 actually conducts interviews of candidates
 18 who are seeking positions as editors of
 19 The New York Post?
 20 A No.
 21 MR. KASOWITZ: I'm just going
 22 to object to the form because -- I'll
 23 object to the form based on his
 24 earlier answer. He said sounds like
 25 people have been there for a while.

Page 25

1 PAUL CARLUCCI
 2 (End of read-back.)
 3 A No.
 4 Q Who has the authority to discipline
 5 employees in the Editorial Department of
 6 The New York Post?
 7 A I do not know.
 8 Q As you sit here today as the
 9 Publisher of The New York Post, did you ever
 10 inquire as to who has the authority to
 11 discipline employees in the Editorial
 12 section of the newspaper?
 13 A Could you repeat that one more
 14 time, the last part, please.
 15 (Requested portion of record read:
 16 "Q. As you sit here today as the
 17 Publisher of The New York Post, did you
 18 ever inquire as to who has the authority
 19 to discipline employees in the Editorial
 20 section of the newspaper?")
 21 (End of read-back.)
 22 A No, I have not.
 23 Q Do you have authority as Publisher
 24 of The New York Post to promote an employee
 25 in the Editorial Department of the

Page 26

1 PAUL CARLUCCI
2 newspaper?
3 A No, I do not.
4 Q Do you know who at The New York
5 Post has the authority to promote
6 an employee in the Editorial Department of
7 the newspaper?
8 A No, I do not.
9 Q Have you ever inquired,
10 Mr. Carlucci, as to who has the authority to
11 promote employees in the Editorial
12 Department of The New York Post?
13 A Not that I can recall.
14 Q Is there a business side and
15 an editorial side of The New York Post?
16 A Yes.
17 Q Can you please describe how is the
18 business side of The New York Post
19 comprised?
20 MR. KASOWITZ: Object to form.
21 You can answer.
22 A Okay.
23 The business side of The New York
24 Post has all the income areas and the profit
25 and loss areas of the publication, and in

Page 28

1 PAUL CARLUCCI
2 Q Do you understand the question?
3 A Who has more authority at The New
4 York Post?
5 Q Yes.
6 A On the business side, I would.
7 Q What about on the Editorial side?
8 A Certainly not me.
9 Q Do you have any authority at all
10 with respect to the Editorial side of
11 The New York Post?
12 MR. KASOWITZ: Object to form.
13 You can answer.
14 A No, I do not.
15 Q Who is your direct supervisor?
16 MR. KASOWITZ: Object to form.
17 A I'm sorry, I didn't hear the
18 question.
19 Q I'll ask it differently.
20 Who do you report to as Publisher
21 of The New York Post?
22 A I report to Chase Carey.
23 Q And whose Chase Carey?
24 A Chase, I believe his title is
25 Deputy Chairman COO, but I'm not sure.

Page 27

1 PAUL CARLUCCI
2 addition to that, the marketing, the human
3 resources, the production, the circulation,
4 the home delivery.
5 And I might have left something out
6 above and beyond that. But it's all the
7 noneditorial functions.
8 Q Are you the highest ranking
9 executive at The New York Post over the
10 noneditorial functions of the newspaper?
11 A Yes.
12 Q And is Col Allan the highest
13 ranking official at The New York Post who is
14 over the editorial functions of The New York
15 Post?
16 A Yes.
17 Q Have you ever played a role,
18 Mr. Carlucci, in the editorial functions of
19 The New York Post?
20 A Not that I recall.
21 Q Who has more authority at the
22 newspaper, you or Col Allan?
23 MR. KASOWITZ: Object to form.
24 I don't know what you mean by "more
25 authority."

Page 29

1 PAUL CARLUCCI
2 Q Of News Corporation?
3 A I believe he is of News
4 Corporation.
5 Q Well, you say he's Deputy Chairman
6 and COO. What is he Deputy Chairman and COO
7 of, Mr. Carlucci?
8 A I believe of News Corporation.
9 Q How long have you reported to Chase
10 Carey as Publisher of The New York Post?
11 A Approximately two years to three
12 years.
13 Q During that time frame of two to
14 three years when you reported to Chase
15 Carey, did you report to anyone else as
16 Publisher of The New York Post?
17 A No, I did not.
18 Q Before you started reporting to
19 Chase Carey, did you report to anyone else?
20 A Yes, I did.
21 Q Who did you report to before
22 reporting to Chase Carey?
23 A I reported to Peter Chernin.
24 Q Peter?
25 A Chernin.

Page 86

1 PAUL CARLUCCI
2 MR. THOMPSON: Can you answer
3 that question.
4 MR. KASOWITZ: I want the
5 answer up until the time he was
6 interrupted.
7 (Requested portion of record read:
8 "A. What I do recall is a
9 conversation that happened in The New
10 York Post Executive Committee on the
11 failure of Tempo -- ")
12 (End of read-back.)
13 A -- and the potential of Tempo
14 coming back or making a comeback that would
15 be profitable.
16 And the trend of the advertising
17 was nonexistent for a long period of time,
18 and there was a group discussion at the time
19 that the editor's position would be
20 terminated.
21 I do not recall a single individual
22 making the determination that the editor --
23 I thought there was input from several
24 people it at that meeting.
25 Q Okay.

Page 88

1 PAUL CARLUCCI
2 terminate Sandra Guzman's employment and you
3 said no.
4 Are you now changing your testimony
5 regarding that matter?
6 MR. KASOWITZ: Object to form.
7 Object to form. He's not changing
8 his testimony. His testimony has
9 been clear.
10 MR. THOMPSON: The record is
11 going to be clear.
12 Q Mr. Carlucci, I'm going to ask you
13 again: Did you make the decision to
14 terminate Sandra Guzman's employment? Yes
15 or no?
16 MR. KASOWITZ: Objection.
17 Asked and answered five times now.
18 Five times.
19 I'll let you answer it one more
20 time.
21 A Okay. I believe the decision to
22 terminate her employment was based on a
23 group discussion at Executive Committee of
24 The New York Post. I specifically don't
25 know who made the determination or who had

Page 87

1 PAUL CARLUCCI
2 So you recall at this meeting that
3 someone mentioned terminating Sandra
4 Guzman's employment because Tempo was going
5 to be closed, correct?
6 MR. KASOWITZ: Object to form.
7 You can answer.
8 A Yes.
9 Q Who in that meeting, Mr. Carlucci,
10 stated that Ms. Guzman's employment would be
11 terminated as a result of Tempo being
12 closed?
13 MR. KASOWITZ: Object to form.
14 You can answer.
15 A I don't recall a specific
16 individual. I recall a group conversation
17 and it could certainly have been from
18 Finance. It could have been from somebody
19 at Human Resources. It certainly could have
20 been me. It could have been anybody that
21 was in the group of the conversation at the
22 time that surfaced that this position would
23 be eliminated.
24 Q Mr. Carlucci, I asked you a couple
25 minutes ago did you make the decision to

Page 89

1 PAUL CARLUCCI
2 the discussion with her.
3 Q Okay. That's fine.
4 So when you say you don't recall
5 who made the determination, is it your
6 testimony, Mr. Carlucci, that you
7 individually did not make the decision to
8 terminate Sandra Guzman?
9 MR. KASOWITZ: Object to form.
10 You can answer.
11 A I specifically don't recall myself
12 making the decision, but it was part of
13 a group discussion that most likely that
14 aspect of it came up.
15 I was most likely more focused on
16 alleviating The Post of a money-losing
17 section and terminating the section.
18 And since the editor was a major
19 expense center of that losing section, that
20 was part of the exiting of the section.
21 Q Mr. Carlucci, would you agree with
22 me that there's a difference between closing
23 Tempo and terminating Ms. Guzman's
24 employment?
25 MR. KASOWITZ: Object to form.